


KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

APPLICATION GRANTED
 SO ORDERED 
 VERNON S. BRODERICK
 U.S.D.J.

January 31, 2025

The Honorable Vernon S. Broderick
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

Date: February 3, 2025

Re: *The Nielsen Company (US), LLC v. TVSquared Ltd.*, C.A. No. 1:23-cv-01581-VSB-SN

Dear Judge Broderick:

Plaintiff The Nielsen Company (US), LLC, (“Nielsen”) and Defendant TV Squared Ltd. (“TVSquared”) respectfully submit this joint letter-motion pursuant to Your Honor’s Individual Rules & Practices in Civil Cases to request to extend the stay in this case for an additional sixty (60) days, through and including April 4, 2025, and to extend all deadlines in the Scheduling Order as shown below. The parties agree that the stay will apply to all interim deadlines, including the service of and responses and objections to written discovery. This is the parties’ third request to extend an existing stay in the case, and seventh request for an extension of time. *See* Dkt. 135, 159, 171, 186, 191, 196. The court granted the previous six requests. Dkt. 137-138, 160-161, 172-173, 189-190, 192-93, 197. In support of this letter-motion, the parties provide the following specific reasons for the stay and extension requests:

The parties are continuing to work towards a mutually agreeable resolution to this lawsuit. Nielsen and TVSquared have exchanged a draft Letter of Intent regarding possible terms, with specific milestone dates included in the letter to assist in progressing towards an agreement. While the parties are diligently working to progress towards a resolution, the parties currently do not have sufficient time to continue such negotiations without incurring substantial costs associated with the close of fact discovery and expert reports. The parties therefore request that the Court extend the existing stay in the case for an additional 60 days, and further permit the parties to extend all remaining deadlines by approximately 60 days to allow for additional time to hold further discussions in lieu of incurring further costs associated with the litigation.

A list of existing deadlines in the procedural schedule, along with the proposed adjusted deadlines, is included below. A proposed order reflecting these revised dates is attached hereto as Exhibit A.

ITEM	CURRENT DATE	PROPOSED DATE
Deadline to serve any interrogatories or requests for admission	April 1, 2025	June 3, 2025
Close of fact discovery	May 2, 2025	July 1, 2025
Opening expert reports by party with burden of proof	June 17, 2025	August 19, 2025
Responsive expert reports by party without burden of proof	July 22, 2025	September 23, 2025

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333 West Wacker Drive, Suite 2600 | Chicago, IL 60606 | (312) 857-7070

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ITEM	CURRENT DATE	PROPOSED DATE
Close of expert discovery	September 9, 2025	November 11, 2025
Joint letter to court regarding dispositive motions	September 30, 2025	December 2, 2025
Telephonic post-discovery teleconference	October 14, 2025	December 16, 2025

Respectfully submitted,

/s/ Jason P. Greenhut

Steven Yovits
Constantine Koutsoubas
Douglas Lewis
Jason P. Greenhut
KELLEY DRYE & WARREN LLP
333 West Wacker Drive
Chicago, IL 60606
Tel: (312) 857-7070
syovits@kelleydrye.com
ckoutsoubas@kelleydrye.com
dlewis@kelleydrye.com

Clifford Katz
KELLEY DRYE & WARREN LLP
3 World Trade Center
175 Greenwich Street
New York, NY 10007
Tel: (212) 808-7800
ckatz@kelleydrye.com
dlindenbaum@kelleydrye.com

Attorneys for Plaintiff
The Nielsen Company (US), LLC

/s/ Richard G. Frenkel

Richard G. Frenkel (*admitted pro hac vice*)
Chaarushena Deb (*admitted pro hac vice*)
LATHAM & WATKINS LLP
140 Scott Drive
Menlo Park, CA 94025
Tel: (650) 328-4600
Fax: (650) 463-2600
rick.frenkel@lw.com
chaaru.deb@lw.com

Patricia Young
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Tel: (212) 906-1200
Fax: (212) 751-4864
patricia.young@lw.com

Gabriel K. Bell (*admitted pro hac vice*)
Diane E. Ghrist (*admitted pro hac vice*)
Ashley N. Finger
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Tel: (202) 637-2200
Fax: (202) 637-2201
gabriel.bell@lw.com
diane.ghrist@lw.com
ashley.finger@lw.com

*Attorneys for Defendant
TV Squared Ltd.*